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6 Attorneys for Plaintiff,  
DAN C.

7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**

9  
10 DAN C.

11 Plaintiff,

12 vs.

13 ANTHEM BLUE CROSS LIFE  
14 AND HEALTH INSURANCE  
15 COMPANY; DIRECTORS GUILD  
16 OF AMERICA—PRODUCER  
HEALTH PLAN; and DOES 1  
through 10,

17  
18 Defendants.

Case No. 2:22-cv-03647-FLA-AFM

**DECLARATION OF DAVID  
LILIENSTEIN IN SUPPORT OF  
PLAINTIFF'S MOTION TO  
COMPEL DISCOVERY  
RESPONSES FROM DEFENDANT  
DIRECTORS GUILD OF AMERICA  
—PRODUCER HEALTH PLAN**

1 I, David M. Lilienstein, an attorney, declare under penalty of perjury, that  
2 the following is true and correct, based on my personal knowledge:

3 1. I am an attorney at law duly licensed to practice before all courts in  
4 the State of California, including this District Court. I am the owner of DL Law  
5 Group, counsel of record for Plaintiff Dan C. in the instant action.

6 2. Pursuant to L.R. 7-3 and L.R. 37, on October 17, 2022 and October  
7 20, 2022, counsel for Plaintiff, Defendant Anthem Blue Cross Life and Health  
8 Insurance Company (“Anthem”), and Defendant Directors Guild of America—  
9 Producer Health Plan (“the Plan”) (collectively “the Parties”) met and conferred  
10 telephonically regarding the Plaintiff’s discovery requests to the Plan. The parties  
11 also corresponded via email as part of the meet and confer process.

12 3. The Parties were unable to completely resolve the present discovery  
13 dispute through the meet and confer process.

14 4. Attached hereto and marked as Exhibit A is a true and correct copy of  
15 Plaintiff’s Special Interrogatories, Set One, served on the Plan on September 14,  
16 2022;

17 5. Attached hereto and marked as Exhibit B is a true and correct copy of  
18 Plaintiff’s Request for Production of Documents, Set One, served on the Plan on  
19 September 14, 2022;

20 6. Attached hereto and marked as Exhibit C is a true and correct copy of  
21 the email exchanges between Plaintiff’s counsel and the Plan’s counsel regarding a  
22 proposed Rule 30(b)(6) deposition;

23 7. Attached hereto and marked as Exhibit D is a true and correct copy of  
24 Defendant’s Response to Plaintiff’s Special Interrogatories, Set One, served on  
25 Plaintiff on October 14, 2022;

26 8. Attached hereto and marked as Exhibit E is a true and correct copy of  
27 Defendant’s Response to Plaintiff’s Request for Production of Documents, Set  
28 One, served on Plaintiff on October 14, 2022;

I declare under the penalty of perjury under the laws of the State of  
California and these United States that the foregoing is true and correct.

Dated: November 8, 2022

/s/ David M. Lilienstein

David M. Lilienstein, Esq.